

**UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>v.</b>	)	<b>Criminal No. 07-73-B-W</b>
	)	
<b>THOMAS I. HICKEY, III</b>	)	

**GOVERNMENT’S VERSION OF THE OFFENSE**

In 2006, Lieutenant Alan Zani of the Massachusetts State Police was assigned to the FBI Bank Robbery Task Force. Lt. Zani had been conducting an investigation into several burglaries in the Boston area, the most recent of which had occurred on February 25, 2006, at the Citizen’s Bank in Charlestown. On March 3, 2006, Lt. Zani secured a Massachusetts state arrest warrant for Thomas Hickey and Meghan Steeves.

Lt. Zani had information indicating that Steeves and Hickey were staying at Hedrich’s Hotel in Presque Isle. A detective from the Presque Isle Police Department obtained a state search warrant for Room 14 of that hotel on March 3. The warrant directed officers to search for a number of items including firearms, ammunition, and a ski mask.

On March 3, a Maine State Police (“MSP”) tactical team made a forced entry into Room 14 at Hedrich’s Hotel at 5:45 in the morning. Steeves and Hickey were in the room. MSP Sgt. Pelletier followed the tactical team into Room 14. When Sgt. Pelletier entered the room he told Hickey that officers would be searching the room and the luggage in the room. Sgt. Pelletier asked if there was any thing in the room or the bags that could harm any officer conducted the search. Hickey responded “yes” and directed Sgt. Pelletier to a maroon athletic bag.

Hickey told Sgt. Pelletier that the bag contained a gun.

Sgt. Pelletier found a semi-automatic pistol in a wool hat inside the maroon athletic bag. The pistol is a .380 Hi Point and it was loaded when seized, although there was not a round in the chamber. The pistol bears serial number P839778. That firearm was manufactured in Ohio. At the time that the defendant possessed this firearm he had been convicted in courts of the State of Massachusetts of crimes that at the time of conviction were each punishable by a term of imprisonment exceeding one year, specifically:

1. Armed assault with intent to rob (Commonwealth of Massachusetts, Superior Court, County of Middlesex, Docket Number 94-2341-002);
2. Assault with a dangerous weapon (Commonwealth of Massachusetts, Superior Court, County of Middlesex, Docket Number 94-2341-003);
3. Unauthorized possession of a firearm (Commonwealth of Massachusetts, Superior Court, County of Middlesex, Docket Number 94-2341-004);
4. Armed robbery (Commonwealth of Massachusetts, Superior Court, County of Middlesex, Docket Number 88-1070);
5. Armed robbery (Commonwealth of Massachusetts, Superior Court, County of Middlesex, Docket Number 88-1073);
6. Armed robbery (Commonwealth of Massachusetts, Superior Court, County of Middlesex, Docket Number 88-1074);
7. Assault with a dangerous weapon (Commonwealth of Massachusetts, Superior Court, County of Middlesex, Docket Number 88-1075);
8. Unlawful carrying of a firearm (Commonwealth of Massachusetts, Superior

Court, County of Middlesex, Docket Number 88-1076);

9. Unlawful carrying of a firearm (Commonwealth of Massachusetts, Superior Court, County of Middlesex, Docket Number 88-1077);

10. Unlawful carrying of a firearm (Commonwealth of Massachusetts, Superior Court, County of Middlesex, Docket Number 88-1078);

Dated: August 19, 2008

Respectfully submitted,

PAULA D. SILSBY  
United States Attorney

By: /s/ F. Todd Lowell

F. Todd Lowell  
Supervisory Assistant U.S. Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that on August 19, 2008 I filed the Government's Version of the Offense with the Clerk of Court using the CM/ECF system which will send notification of such filing(s) to the following:

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